

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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7 WEST 57 <sup>TH</sup> STREET REALTY COMPANY, LLC,	:
	:
Plaintiffs,	:
	:
v.	:
	:
CITIGROUP, INC., ET AL.	:
	:
Defendants.	:
-----X	

**13-civ-981 (PGG)**

**DECLARATION OF MARC J.  
GOTTRIDGE IN SUPPORT OF  
MOTION PERMITTING  
WITHDRAWAL OF ERIC J.  
STOCK AS COUNSEL**

MARC J. GOTTRIDGE hereby declares:

1. I am a partner at Hogan Lovells US LLP (“Hogan Lovells”) and am a member in good standing of the Bars of the State of New York and of this Court.

2. I submit this declaration in support of the motion, pursuant to Local Civil Rule 1.4, of defendants Lloyds Banking Group plc and HBOS plc (collectively, “Lloyds”) for an order permitting the withdrawal of my former partner Eric J. Stock as one of the counsel of record for Lloyds in this action. Except as expressly stated otherwise, this declaration is based on my personal knowledge of the facts set forth below and on this Court’s docket in this action.

3. Lloyds has engaged Hogan Lovells to represent it in various litigation matters in the United States relating to the London Interbank Offered Rate (LIBOR), including this action. I am the partner principally responsible for the representation of Lloyds in all LIBOR-related litigation in this Court and elsewhere in the United States. Until his recent departure from our firm (described below), Mr. Stock was one of the other lawyers at Hogan Lovells assisting me in that representation.

4. On April 19, 2013, Hogan Lovells filed notices of appearance (Docket Entries 40 and 41, respectively) for myself and Mr. Stock as counsel for Lloyds in this action.

5. Effective May 31, 2013, Mr. Stock ceased to be a partner in, and to have any affiliation with, Hogan Lovells. He has advised me that he has accepted the position of Chief of the Antitrust Bureau of the New York State Attorney General's Office.

6. Prior to May 31, 2013, Hogan Lovells advised Lloyds of Mr. Stock's intended departure from the firm, and Lloyds has advised me that it therefore desires that an order be entered permitting the withdrawal of Mr. Stock as one of its counsel of record in this action. Lloyds also desires that I continue to be counsel of record for it in this action, and at its request, I will remain as counsel of record.

7. This action is at an early stage. Defendants have not yet answered or moved to dismiss Plaintiffs' complaint. In light of the procedural posture of this action and more importantly because Hogan Lovells and I will continue to represent Lloyds in this action, neither the Court nor any party will be inconvenienced, much less prejudiced in any way, by the withdrawal of Mr. Stock. The relief sought by Lloyds through this motion will not delay or in any way adversely affect the Court's management or adjudication of any aspect of this action.

8. Mr. Stock has confirmed to me that he is not asserting a retaining or charging lien.

I declare under penalty of perjury that the foregoing is true and correct.

Date: New York, New York  
June 4, 2013

/s/ Marc J. Gottridge  
MARC J. GOTTRIDGE